

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN**

NATIONAL WILDLIFE REFUGE ASSOCIATION, et al.,

Plaintiffs,

v.

RURAL UTILITIES SERVICE, et al.,

Federal Defendants,

AMERICAN TRANSMISSION COMPANY, LLC, et al.,

Intervenor-Defendants.

No. 3:21-cv-00096-wmc

Consolidated with No. 3:21-cv-000306-wmc

NATIONAL WILDLIFE REFUGE ASSOCIATION, et al.,

Plaintiffs,

v.

UNITED STATES ARMY CORPS OF ENGINEERS, et al.,

Federal Defendants,

AMERICAN TRANSMISSION COMPANY, LLC, et al.,

Intervenor-Defendants.

CO-OWNERS' NOTICE OF MOTION AND MOTION TO STAY JUDGMENT PENDING APPEAL

Pursuant to Fed. R. Civ. P. 7(b) and 62, American Transmission Company LLC by its corporate manager ATC Management Inc., ITC Midwest LLC, and Dairyland Power Cooperative (collectively, the "Co-owners") move this Court to stay pending appeal the final judgment it enters in the above-captioned proceeding following its Opinion and Order (*see* ECF No. 175) on the parties' cross motions for summary judgment. The grounds for this motion are set forth more fully in the Co-owners' Brief on Remedy and Brief in Support of Motion for Stay Pending Appeal, which is being filed concurrently herewith.

DATED: January 31, 2022

Respectfully submitted,

s/ Thomas C. Jensen

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American Transmission Company LLC by its
corporate manager, ATC Management Inc.,
ITC Midwest LLC and Dairyland Power
Cooperative.*

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2022, I electronically filed the forgoing document with the Clerk of Court using the Court's ECF system, which will serve the document on all counsel of record registered for electronic filing in the above-captioned proceeding.

Dated: January 31, 2022

/s/ Thomas C. Jensen
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